

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
	:	
V.	:	1:20CR317
	:	
	:	
ISMAY PRUDENCE KATHLEEN JAMES	:	

DEFENDANTS RESPONSE TO GOVERNMENT'S MOTION IN
LIMINE AND MEMORANDUM OF LAW IN SUPPORT THEREOF

The Defendant, Ismay Prudence Kathleen James, by and through undersigned counsel, hereby files this response to the Government's Motion in Limine and Memorandum of Law in Support Thereof, moving the Court to exclude the affirmative defense of entrapment by estoppel and evidence related thereto.

Ms. James did speak telephonically to the agents in this case. However, Ms. James did not tell the agents investigating this case that a United States Citizenship and Immigration Services employee advised her to register to vote or to vote.

At no stage, prior to arrest or during the pendency of this case, did Ms. James, or those linked to Ms. James, indicate to any official involved with this case, or any third party, that she will introduce at

trial evidence that she was entrapped into voting, or registering to vote, based on a conversation she had with a United States Citizenship and Immigration Services employee.

Ms. James will not raise the affirmative defense of entrapment by estoppel.

This the 25th day of November 2020

/ s / Alan Doorasamy Sr.
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Matthew G.T. Martin, Esq.
United States Attorney

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Middle District of North Carolina
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This the 25th day of November 2020

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